



Order Filed on January 16, 2020
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(c)
McGovern Legal Services, LLC
By: Marlana S. Diaz-Cobo, Esq.
850 Carolier Lane
North Brunswick, NJ 08902
(732) 246-1221
Attorneys for Sixty Acre Reserve Condominium
Association, Inc.

In Re:

MARIE CATHERINE SOSA

Case No.: 18-24035

Judge: Michael B. Kaplan

Chapter: 13

CONSENT ORDER RESOLVING CREDITOR'S MOTION FOR STAY RELIEF

The relief set forth on the following pages, numbered one (1) through four (4) is hereby **ORDERED**.

DATED: January 16, 2020


Honorable Michael B. Kaplan
United States Bankruptcy Judge

McGOVERN LEGAL SERVICES, LLC
BY: MARLENA S. DIAZ-COBO, ESQ.
850 CAROLIER LANE
NORTH BRUNSWICK, NEW JERSEY 08902
(732) 246-1221
ATTORNEYS FOR SIXTY ACRE RESERVE CONDOMINIUM ASSOCIATION, INC.

In re:

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
IN PROCEEDINGS UNDER CHAPTER 13
OF THE BANKRUPTCY CODE

MARIE CATHERINE SOSA

CASE NO.: 18-24035-MBK

Debtor.

CONSENT ORDER

CONSENT ORDER RESOLVING CREDITOR'S MOTION FOR STAY RELIEF

THIS MATTER having been brought before the court by McGovern Legal Services, LLC, attorneys for creditor, Sixty Acre Reserve Condominium Association, Inc. (the "Association"), by way of a Motion for Stay Relief and the parties having consented to the relief set forth herein, and for good cause shown and no cause to the contrary appearing;

IT IS ORDERED, ADJUDGED AND DECREED THAT the Debtor was indebted to the Association in the amount of \$2,599.00 in post-petition maintenance fees, late fees and attorneys' fees related to the Association's attempts to collect unpaid post-petition fees through December 9, 2019 (the "Total Due"). The Total Due is detailed below:

Maintenance Fees:	\$3,642.00
Late Fees:	\$150.00
Payments:	-\$2,732.00
<u>Legal (work related to post-petition default through 12/9/2019):</u>	<u>\$1,539.00</u>

Total:

\$2,599.00

IT IS FURTHER ORDERED, ADJUDGED AND DECREED THAT the Debtor shall pay the Association \$940.00 on or before December 20, 2019.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED THAT the Debtor shall pay the Association \$276.50 per month, commencing on February 1, 2020 and continuing until the Total Due is satisfied (the "monthly cure payment"). The monthly cure payment shall be paid by certified check made payable to Sixty Acre Reserve Condominium Association, Inc. and received by McGovern Legal Services, LLC, 850 Carolier Lane, North Brunswick, NJ 08902 on or before the first of each month until the Total Due is satisfied.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED THAT the Debtor shall maintain post-petition assessments and other post-petition obligations as they become due and owing to the Association commencing on January 1, 2020; and

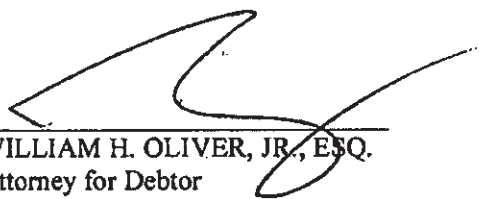
IT IS FURTHER ORDERED, ADJUDGED AND DECREED THAT if the Debtor fails to make the immediate payment specified above or fail to make any regular monthly payment or the additional monthly cure payment within thirty (30) days of the date the payments are due, then the Association may obtain an Order Vacating the Automatic Stay as to the Collateral by filing, with the Bankruptcy Court, a Certification specifying the Debtor's failure to comply with this order. At the time the Certification is filed with the court, a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtor, and the Debtor's attorney.

**WE HEREBY CONSENT TO THE FORM
AND ENTRY OF THIS CONSENT ORDER:**

McGovern Legal Services, LLC
Attorneys for Sixty Acre Reserve
Condominium Association, Inc.


MARLENA S. DIAZ-COBO, ESQ.

1/8/2020
DATE


WILLIAM H. OLIVER, JR., ESQ.
Attorney for Debtor

1/6/2020
DATE